## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

UNITED STATES OF AMERICA	)
V.	) Case No. 3:98-cr-00038-15 ) Senior District Judge Nixon
TONI TULLOCH	)

## MOTION OF DEFENDANT TONI TULLOCH TO RESCHEDULE AUGUST 10, 2012 HEARING FOR RE-SENTENCING

The Defendant, Toni Tulloch, has her re-sentencing hearing set to be heard on Friday, August 10, 2012 at 10:00 a.m.

By this motion, Defendant asks the Court to enter an Order that re-schedules the hearing on Ms. Tulloch's re-sentencing until a later date. The grounds for this motion are that counsel for Ms. Tulloch, Sabin R. Thompson, and counsel for the government, AUSA Sunny Koshy, have agreed that a later date in the latter part of September, 2012, would be a better hearing date under the circumstances of this particular case. The reasons for the requested hearing date in the latter part of September are the conflicts in the schedules of the two attorneys as well as the need to allow time for the completion of certain necessary tasks prior to the hearing. The undersigned has spoken with AUSA Sunny Koshy about this and AUSA Koshy has authorized him to state that the government has no objection to the requested continuance.

Wherefore, Defendant Toni Tulloch prays that her re-sentencing hearing be re-scheduled to a later date, preferably in the latter part of September, 2012.

Respectfully submitted,

/s/ Sabin R. Thompson Sabin R. Thompson (6876) Prochaska Thompson Quinn & Ferraro, P.C. 401 Church Street, Suite 2600 Nashville, Tennessee 37219 Telephone: 615-242-0060 Email: sabin@ptqflegal.com

## Certificate of Service

I hereby certify that a copy of the foregoing Motion has been served upon the following individuals by United States Mail, first-class postage pre-paid on this the 8th day of August, 2012:

Sunny A.M. Koshy Assistant U.S. Attorney 110 9th Avenue South, A-961 Nashville, Tennessee 37203 Telephone: 615-736-5151

United States Probation and Pre-trial Services 110 9th Ave S # A725 Nashville, TN 37203

Sabin R. Thompson
Sabin R. Thompson
Sabin R. Thompson
26, 2012

Completed September 26, 2012

Re-set for Aut 10:00 a.m.

Re-set